REMARKS

Claims 1-11 and 13-29 are pending in this application.

Claims 1, 10, 11, 16, 22 and 28 are independent.

The Examiner's approval of the proposed drawing changes and amendment to the specification, and the withdrawal of the prior rejections under 35 USC §112, is noted with appreciation.

Additionally, the allowance of claim 28 is noted with appreciation.

Claims 1-5, 10, 11, 14, 16-20 and 29 stand rejected under 35 USC §102(e), as anticipated by Haimowitz et al. (U.S. Patent No. 5,819,291). Claim 8 stands rejected under 35 USC §103(a), as obvious over Haimowitz. Claims 6, 7, 9, 13, 15 and 21-27 stand rejected under 35 USC §103(a), as obvious over Landry (U.S. Patent No. 5,649,117), in view of Haimowitz. The rejections are respectfully traversed.

The arguments traversing the prior art rejections, as set forth in the remarks of the Amendment filed on November 15, 2002, are reasserted herein in their entirety.

On pages 3-8 (paragraphs 5-8) of the final Official Action, the Examiner responds to certain of the arguments traversing the prior art rejection, submitted in the prior response on November 15, 2002.

More particularly, in paragraph 6, the Examiner corrects the misunderstanding of Applicants' representative that claim 14 had been deemed allowable, in view of the lack of any prior art being applied against claim 14 in the prior Official Action of August 16, 2002. Applicant's representative appreciates the Examiner's clarification.

However, the finality of the present rejection is improper, since new grounds of rejection have been applied against claim 14 and Applicants have had no prior

opportunity to respond to these grounds of rejection. It is noted that, although the Examiner asserts that it should have been understood that claim 14 stood rejected in view of the prior rejections of claims 8 and 5, even in the present action to which this response relates, claim 14 is rejected on grounds other than those asserted in the rejection of claims 8 and 15. Accordingly, it is respectfully requested that the finality of the rejection be withdrawn.

In paragraph 8, a response is provided to the prior traversal arguments relating to independent claims 1, 10, 11, 16 and 22 (not 20). Traversal arguments relating to the rejection of claims 8 and 9 are also responded to in paragraph 8. However, it does not appear that a response has been provided to the traversal arguments relating to claim 2.

In any event, as now understood, the Examiner acknowledges that Haimowitz discloses a process having multiple alternative processing paths. The disclosed paths are as follows:

IF A ZIPCODE IS PROVIDED

1) If the provided zipcode does not match the provided city and state (i.e. cannot be verified), then the record is set aside to pending file 22 for future resolution, and is not used to generate the "hash code"; or

2) If the provided zipcode matches the provided city and state (i.e. is verified), then the received zipcode is utilized to generate the "hash code".

IF NO ZIPCODE IS PROVIDED

3) If no zipcode is provided, only the provided city and state information is used to identify or produce a 5-digit zipcode, and this zipcode is utilized to generate the "hash

code".

Notwithstanding the Examiner's acknowledgement of the above, the Examiner, as can be best understood, argues that Haimowitz's generation of the "hash code" somehow corresponds to the identification or production of the "zipcode" in the present claims. The rationale for the Examiner's conclusion, as best understood, is flawed.

More particularly, while it is acknowledged that the "hash code" represents a name, city, state and zipcode, the Examiner's assertion that Haimowitz's "hash code" corresponds to a zipcode remains unclear.

The Examiner states that "the rejection was based on the fact that Haimowitz took the customer's data (name, address, city, state, zipcode) to generate a record ID (i.e., hash code) to access already existing records in the database. This is no different [than] the lookup methodology recited by the present application with the exception that the record ID is an 11-digit zipcode. However, as explained in the rejection, the hash code of Haimowitz is no different in substance than an 11-digit zipcode since they both contain the same type of information, (e.g., 5-digit zipcode plus delivery sector plus building number) and generated in the manner recited. Applicant is reminded that there is no recitation in the claims directed to "looking up" the 11-digit zipcode based on the "other information"...Rather, the claims recite that the 11-digit zipcode (i.e., record ID) is "identified" or "produced" using information other than the provided zipcode."

The Examiner's argument is circular and ignores explicit claim limitations. One can only ask how a "hash code" which is explicitly disclosed to be generated from a "zipcode" can be the same as a "zipcode".

The Examiner also relies upon Haimowitz acting as his/her own lexicographer in

characterizing an "11-digit zipcode" as "hash code". Here again, the Examiner's logic is not understood. Haimowitz never even mentions an "11-digit zipcode".

An "11-digit zipcode" is a term of art and has a concise definition which the Examiner relied upon in previously presented positions set forth in paragraphs 9 and 10 of the prior Official Action of August 16, 2002. Hence, the Examiner appears to be taking contradictory positions with respect to the meaning of an "11-digit zipcode".

Furthermore, even if the "hash code" described by Haimowitz could be considered equivalent to an "11-digit zipcode" (which it is respectfully submitted is not the case), it is never identified or produced based upon received information, excluding a received zipcode (see "IF A ZIPCODE IS PROVIDED" above). As discussed above, the "hash code" described by Haimowitz is generated either by using the received zipcode, if a zipcode is received and verified, or by using a zipcode which has been identified or produced using received information which did not include a zipcode.

Hence, the Examiner appears to be either ignoring how Haimowitz generates the "hash code", the explicit limitations of the present claims. In either case, the present claims clearly distinguish over the applied prior art and the Examiner continues to fail to provide any reasonable objective support or rationale for the rejection of the claims.

Further still, as discussed in the remarks of the previous response, Haimowitz is incapable of identifying or producing an 11-digit zipcode. Indeed, using the Examiner's detailed discussion of 11-digit zipcodes in the Official Action of August 16, 2002, there can be no question but that the Haimowitz "hash code" does not correspond to the required "11-digit zipcode".

The Examiner asserts that the "hash code" described by Haimowitz corresponds

to an 11-digit zipcode, but fails to provide any rational support for this contention. Rather the Examiner, as can be best understood, seems to base this conclusion on the fact that the "hash code" includes a name, city and state.

As the Examiner acknowledges on page 7 of the prior Official Action, an "11-digit zipcode" must include two digits of the street address. However, the Examiner now asserts that the "hash code" is equivalent to an 11-digit zipcode because the "hash code" includes a name, city and state. Hence, it cannot be understood how the Examiner contends this correspondence exists since the "hash code", as described by Haimowitz, does not include a street address.

More particularly, in the last sentence of the paragraph bridging pages 5 and 6 of the Official Action to which this response relates, the Examiner asserts that Haimowitz's "hash code" is the same as an "11-digit zipcode" because they both contain the same information including a "building number".

However, in the same paragraph the Examiner acknowledges that Haimowitz's "hash code" is generated using only a name, city, state and zipcode (i.e. no street address or building number). Furthermore, in the quoted text bridging pages 12 and 13 of the Official Action, which sets forth the basis for the anticipation rejection over Haimowitz, the Examiner explicitly cites text from Haimowitz's disclosure which confirms that no "building number" is used to generate the "hash code".

There appear to be other inconsistencies in the positions being asserted by the Examiner which makes it impossible to understand the basis for the rejection.

For example, the Examiner contends, with respect to claims 1, 11 and 16, that because there is no recited effectuating of a payment, the requirement that the records

relate to a payee is given no patentable weight.

However, claims 1, 11 and 16 recite that the data received is either a payor's payment information (see claims 1 and 11) or is received from a payor (see claim 16). Hence, the fact that a payee record is to be located based upon information received from an entirely different entity has significance in these claims, and must be given patentable weight with respect to the claimed process or system.

The Examiner also states, on page 12 of the Official Action, that Haimowitz generates a zipcode from address information if the zipcode is missing or incorrect.

However, as noted above, the Examiner has not identified any disclosure within Haimowitz describing the generation of a zipcode from address information which includes an incorrect zipcode. Rather, contrary to the Examiner's assertion, Haimowitz explicitly discloses that address information having an incorrect zipcode is simply set aside for later resolution. Indeed Haimowitz even includes a special area for storage of such incorrect address information. Here again, the Examiner appears to acknowledge, in another assertion, that Haimowitz does not utilize incorrect address information (see page 5 of the Official Action). This inconsistency in the Examiner's positions makes it impossible to understand the basis for the rejection. Furthermore, prior arguments pointing out such deficiencies are not addressed in the Examiner's response to the prior traversal arguments.

It is also noted that in the sentence bridging pages 4 and 5 of the Official Action to which this response relates, the Examiner asserts that "applicant's main argument is that Haimowitz does not "identify" (claims 1-10, 16) or "produce" (claims 11, 20) and 11-digit zipcode by processing information other than the zipcode provided by the payee".

However, this is incorrect. First, it should be understood that to the extent the claims recite that an entity provides a "zipcode" which is not utilized, that entity is the payor not the payee. Second, as noted above, the arguments presented in the prior response also recognized Haimowitz use of a "received zipcode" (i.e. a verified zipcode) to generate the "hash code" which the Examiner (it is respectfully submitted incorrectly) asserts is effectively the same as an "11-digit zipcode".

Furthermore, other arguments in traversal of the prior art rejection, as presented in the prior response of November 15, 2002, relied upon the fact that Haimowitz not only fails to generate an "11-digit zipcode" or any equivalent thereto, but is in fact incapable of doing so from the information utilized in generating the "hash code". Additionally, Haimowitz never suggests the use of a name in generating a zipcode, and in fact explicitly teaches that a zipcode is generated without utilizing a name.

In summary, one is only left to wonder on what basis the Examiner contends that one skilled in the art would consider Haimowitz's "hash code" equivalent to a "zipcode", when Haimowitz includes explicit teachings related to "zipcodes" and explicitly uses language other than "zipcode" in describing the "hash code". Indeed, Haimowitz even describes the "hash code" to include an identified or produced "zipcode". Here again, the Examiner's arguments appear to be circular, and at best inconsistent with the applied prior art's own teachings.

In conclusion, it is respectfully submitted that the Examiner has failed to establish, on any reasonable grounds, that Haimowitz (or the applied combination of Haimowitz and Landry) teaches or suggests numerous features recited in each of the independent claims. Such features include, *inter alia*, the following:

CLAIM 1

1) Receiving information from one entity, including a zipcode of another entity;

2) processing this information other than the received zipcode to identify an 11-digit zipcode for the other entity; and

3) accessing a database to locate a record associated with the other entity having a zipcode corresponding to the identified 11-digit zipcode.

CLAIM 10

1) Processing received name, city and state information to identify an 11-digit zipcode; and

2) accessing a database to locate a record for an entity corresponding to the identified 11-digit zipcode.

CLAIM 11

1) A data input unit configured to receive a payor's payment information, which includes a zipcode of a payee; and

2) a processor configured to process the received payment information, excluding the received payee zipcode, to produce an 11-digit zipcode for the payee and to retrieve a payee record having an associated zipcode corresponding to the produced 11-digit zipcode.

CLAIM 16

1) Receiving payment information from one entity, which includes a zipcode of another entity;

2) processing the received payment information, excluding the received other entities zipcode, to identify an 11-digit zipcode for the other entity; and

3) accessing a database of records to locate a record associated with the other entity corresponding to the identified 11-digit zipcode.

CLAIM 22

1) A first station, coupled to a network , configured to generate payment information including a payee name, payee address data, and a payor account number with a payee; and

2) a second station, coupled to the network, configured to receive the payment information from the first station via the network, process the payment information, including the payee name and the payee address data, to produce an 11-digit zipcode for the payee, to access a database to locate a payee record for the payee which corresponds to the produced 11-digit zipcode, and to direct a payment to the payee in accordance with the located payee record.

Turning now to the dependent claims, it is respectfully submitted that various features recited in these claims further distinguish over the applied prior art. As noted above, some of the prior traversal arguments relating to these features are addressed in paragraph 8 of the Official Action to which this response is directed.

In this regard, the Examiner submits that Haimowitz's "normalization" is equivalent to the alteration required, for example, in claim 8 of the present application, because "the data is reformatted into a designated standardized format" and that the standardized format is "based on the entity to which the data is associated (i.e., which the database must be searched for the existing record), such as a general business database or hospital database". The Examiner's rationale is not understood.

Claim 8 requires only one database having payee records, with each record

having a payee zipcode. Claim 8 further requires that this same database include respective different alteration rules, corresponding to different payees associated with the payee records in the single database. Hence, one can only ask what the relevance of multiple different databases is to the recitals and limitations of claim 8.

Claim 9 requires that an account number be processed to identify one of a plurality of remittance centers to which payment is to be remitted.

The Examiner has apparently misunderstood the traversal arguments presented in the prior response of November 15, 2002. Although it was noted in the prior response that remittance centers receive remittance advice, while financial institutions ultimately receive payments, there was no intended implication that remittance centers do not also receive payments.

What is implicit in the statement is that even in those instances where payment is received by a remittance center (e.g. a check is forwarded with the remittance advice to a remittance center), a financial institution ultimately receives these payments. That is, the received payment must ultimately be deposited in an account at the financial institute. The main point in the previously presented traversal arguments was and remains the fact that Landry lacks any suggestion whatsoever of the selection of one of multiple remittance centers for a particular payee. Even accepting the fact that merchants may historically have had multiple bank accounts as noted by the Examiner, Landry lacks any teaching or suggestion of the required selection.

Although the Examiner asserts that "construing the remittance centers as recited to the financial institutes is not an unreasonable claim construction", the Examiner provides no support for this bald statement. Presumably, the Examiner has reviewed

the specification prior to construing the claims, as required under the MPEP. Assuming this to be the case, the Examiner should clearly understand that such a construction would be inconsistent with the present specification, as well as the understanding of those skilled in the art. In any event, as noted above Landry lacks the required selection of claim 9.

The Examiner asserts that "all electronic or physical payments are routed to the appropriate financial institution designated by the payee. Examiner's Official Notice was based on this fact and therefore it would have been obvious to one with ordinary skill in the art to route the payments to the correct financial institute for payment".

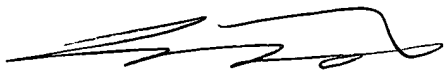
Indeed, these assertions are tantamount to an acknowledgement that the Examiner's rationale does not support the asserted conclusion. More particularly, accepting, for purposes of argument, the Examiner's Official Notice (i.e. that all electronic or physical payments are routed to the appropriate financial institute designated by the payee), there would be no need to identify one of a plurality of remittance centers in claim 9, since the payee would have already designated the proper remittance center. However, contrary to the Examiner's Official Notice, a payee may designate multiple remittance centers. Therefore a service provider must determine which of these multiple remittance centers a payment is to be remitted to. Hence, the present invention provides the functionality necessary to make this selection. This, in turn, allows the single service provider to make payments on behalf of payors whose payments must go to different remittance centers of the same payee.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance and an early indication of the same is courteously solicited. The

Examiner is respectfully requested to contact the undersigned by telephone at the below listed local telephone number, in order to expedite resolution of any remaining issues and further to expedite passage of the application to issue, if any further comments, questions or suggestions arise in connection with the application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 01-2135 and please credit any excess fees to such deposit account.

Respectfully submitted,
ANTONELLI, TERRY, STOUT & KRAUS, LLP



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